UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: ECL-116

ACTION MEMORANDUM

DATE: April 27, 2005

SUBJECT: Request for Temporary Relocation of Residents at the North Ridge Estates Asbestos Site, Klamath Falls, Klamath County, Oregon

FROM: Daniel D. Heister
On-Scene Coordinator

TO: Daniel Opalski, Director
Office of Environmental Cleanup

THRU: Chris Field, Manager
Emergency Response Unit
Office of Environmental Cleanup

CERCLIS ID#: **ORN001002476**
SUPERFUND SITE ID: **10DH**
CATEGORY OF REMOVAL: Time-Critical Removal

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval for a temporary relocation action described herein for the North Ridge Estates (NRE) Asbestos Site, Klamath Falls, Klamath County, Oregon. This relocation is voluntary for residents, but EPA believes it is appropriate for immediate reduction of the risk to the public and the environment from the uncontrolled release of asbestos at the Site. The temporary relocation would occur between June 10 and September 10, 2005. This time period encompasses summer vacation when all of children at the site would be at home and the climate at the site is at its driest and windiest. This is also the period during which most assessment and removal activity is expected to occur.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The historical evidence on this Site is voluminous; an abridged version follows. In 1944, the United States Department of Defense constructed the Klamath Falls Marine Barracks. The barracks, which hosted up to 5,000 Marines and included over 80 buildings, was designed to treat World War II Marine Corps combat veterans who suffered from tropical diseases related to prolonged combat. Asbestos-containing building materials, including roofing, siding, and flooring, were used throughout the barracks. In addition, underground asbestos insulated steam pipes were installed throughout the facility to heat all the buildings from a central steam plant.

The barracks were closed in 1946 and the facility became the campus for the Oregon Technical Institute (now Oregon Institute of Technology). The facility served as the campus until 1964. The property has been privately owned or operated since 1966. During this time period property owners, operators, or contractors stripped the vacant buildings of salvageable materials such as copper and wood. According to former site workers, asbestos insulation was stripped from piping and boilers; metal was sold, and the insulation remained at the Site. The property was purchased on or around December 21, 1977 by Melvin L. Stewart, Maurice E. Bercot, and Kenneth L. Tuttle M.D., P.C., Employees Profit Sharing and Pension Fund for Kenneth L. Tuttle (hereinafter, "Tuttle Trust"). Together, Mr. Stewart, Mr. Bercot, and Mr. Tuttle formed a partnership known as "MBK"for the purpose of developing the former marine barracks and college campus into the residential development known today as North Ridge Estates.

Many of the buildings were demolished in the late 1970's and early 1980's under MBK ownership. The former gymnasium building was not demolished until some time after 1990.

Klamath County approved subdivision plans while the property was under the ownership of MBK. The construction of homes in the subdivision started in 1992.

In July 2001, DEQ received a citizen complaint of exposed Asbestos Containing Material (ACM) at the Site. In April of 2002, DEQ provided notice of the Site to EPA Region 10. DEQ also contacted the Oregon Department of Human Services (ODHS) Superfund Health Investigation

& Education program in May 2002 for assistance in assessing the health risks of exposure to fragments of ACM scattered over approximately 100 acres in the NRE subdivision. In a health consultation document issued by ODHS, in consultation with U.S. Agency for Toxic Substances and Disease Registry (ATSDR), determined that there is a clear risk of health effects from exposure to friable asbestos as represented by the volume and extent of friable ACM fragments found on the Site surface in NRE. ODHS and ATSDR consider this situation a past and present public health hazard.

In June 2002, DEQ and MBK entered into a Mutual Agreement and Order (MAO) (Order No. AQ/AB-ER-01-250A). The MAO essentially provided for a survey of affected properties to identify visible ACM and outlined provisions and protocol for the removal of this material. In the summer of 2002, MBK reportedly removed approximately 50 tons of ACM from the surface of residential lots in the subdivision.

In April 2003, DEQ referred the site to EPA Region 10. An Administrative Order on Consent (AOC) was signed by EPA Region 10 and MBK in May of 2003. Under the AOC a removal action was conducted by MBK and its contractors with close EPA oversight. Actions included: removal of visible surface ACM, identifying the extent and degree of asbestos contamination through extensive soil and air sampling, and identifying and mitigating further exposure through excavation or capping of burial pits and delineation of remaining buried steam line. A parallel and contemporaneous Streamlined Risk Assessment was conducted in cooperation with an EPA Region 10 toxicologist and MBK's asbestos consultant.

The removal action was carried out from June 2003 through August 2004. Approximately seven tons of visible ACM were removed by hand from the surface of occupied lots, approximately 77 tons of heavily contaminated soil were excavated, 13 potential burial locations were identified and stabilized, and several thousand linear feet of buried steam pipe were located. EPA did a limited survey of occupied lots in April 2004 and March 2005. When the surface pick up of the lots was completed in September of 2003, visible ACM was mostly nonexistent. As of the March 2005 survey, wind erosion, snow melt, foot traffic and frost heave are believed to have caused significant resurfacing of near surface ACM. Potentially most significant was the discovery of degraded "aircell" asbestos pipe wrap on unoccupied lots during the 2004 survey. This material is very friable especially in a degraded state. A separate abatement was conducted in May of 2004 to collect this material. Much smaller quantities of aircell were observed during the March 2005 survey, but enough to suggest its presence and potential for resurfacing.

In December 2004, MBK filed for Chapter 11 bankruptcy protection. On March 15, 2005, EPA Region 10 issued a Unilateral Administrative Order (UAO), Docket No. CERCLA-10-2005-0090, to individuals including Melvin L. Stewart and Kenneth Tuttle, as trustee of the Tuttle Trust, two of the original partners of the MBK partnership. On April 12, 2005, EPA issued a second UAO, Docket No. CERCLA-10-2005-0147, to Maurice E. Bercot, the other original partner of the MBK Partnership. All individuals have agreed to comply with the UAOs. Together, the UAOs require the MBK partners to conduct a Remedial Investigation/Feasibility Study (RI/FS) for the Site, subject to EPA oversight. The RI/FS for the Site is intended primarily to determine the nature and extent of asbestos contamination at North Ridge Estates, and to identify and evaluate alternatives for a final response action to ensure the permanent protection of human health at the Site. As part of the RI/FS process, EPA anticipates that sampling activities will be conducted at the Site this summer. Such sampling activities, including the excavation of soils in close proximity to residential houses, may pose a substantial risk of releasing asbestos fibers into the air during short periods.

In March 2005, an individual was identified who stated he worked and lived at the site from 1978 until 1982 and stated that demolition of buildings was ongoing during the entire time. He said that ACM from a given building demolition would usually be deposited in a depression or low point near the building and occasionally ACM that would not fit in the pit would be loaded on to a dump truck and disposed of at remote locations both on and off the site. He said that the site had multiple burial pits and numerous piles off site.

EPA and DEQ representatives toured the site with the individual after the interview and confirmed at least some of the information. The individual's insights increased the understanding and complexity of the site and will assist in accurately delineating the extent of buried ACM material in the 2005 construction season.

2. Physical Location

NRE is located in South Central Oregon in a high desert area (elevation of 4,700 feet) in Klamath County, Oregon, approximately 5 miles northeast of Klamath Falls, Oregon (T39 R9 S15). The Site is a subdivision located along both sides of Old Fort Road. The subdivision was platted and built in the 1990's. Vegetation in the area is sparse, with some scattered ponderosa pines, juniper, and sagebrush. Soil is volcanic and rocky in places. The climate is relatively arid, with an average annual precipitation of 13.2 inches. The majority of precipitation falls in the form of snow in

the winter. Snow falls between early November and early April with the melt typically completed by early May. June through August are the driest period characterized by high temperatures ranging from 85 to 100 degrees F, and steady north winds from 10 to 20 mph with 40 mph gusts.

Most of the military barracks buildings were west of Old Fort Road. A sewage treatment facility and horse barns were built one-quarter mile to the north. A medical laboratory, dispensary, medical staff housing, the brig, and a rifle range were built on the hillside on the other side of Old Fort Road. The only remaining military buildings are a warehouse (vacant), the brig (renovated into a 5-unit apartment building), and the medical staff housing (residences on Thicket Court).

3. Site Characteristics

The ACM on site are remnants from the demolition of a complex of over 80 buildings constructed in 1944. Underground asbestos-insulated piping and several disposal sites with asbestos containing materials have been identified on several lots. Sampling by DEQ in 2001 confirmed that the ACM and steam pipe insulation were composed of 10% to 90% asbestos. The ACM fragments were determined to be friable, as they had been fragmented through demolition and were crumbling and deteriorating to the touch. MBK has sold some of the lots, but currently retains ownership of some portion of the property.

Currently there are 80 residents, including 30 children (24 under age twelve), in the area surveyed for ACM fragments. There are 25 homes, nine vacant home sites, and a memorial park, privately owned but open to the public, in this section of the subdivision. These 25 homes are in the foot print of the Marine Barracks and will be the focal point of the relocation effort. There are three properties outside the foot print with significant ACM that will also be considered for relocation. East of Old Fort Road are several homes, a five-unit apartment building, and additional North Ridge Estates lots. Land to the west, north and east of the subdivision is zoned for forestry, grazing, and agriculture. According to the 2000 U.S. Census, there are 98 residents, including 14 children age six and under, within one half mile of the property.

4. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant, or Contaminant.

Asbestos is a hazardous substance as defined by 40 CFR Section 302.4 of the National Contingency Plan (NCP). Other contaminated dust and soil created by the demolition activities likely remain in the environment and can be re-entrained, leading to inhalation exposures.

5. National Priorities List (NPL) Status

The Site is not presently on the NPL.

6. Maps, Pictures and other Graphic Representations

See Attachment A (Site Map). In addition, many other maps, pictures, and graphic representatives will be found in the administrative record supporting the removal action.

B. Other Actions to Date

1. Previous Actions

Previous actions are discussed above in Section II.A 1 .

2. Current Actions

The most current Actions are discussed in II.C.1 below.

C. State and Local Authorities' Roles

1. State and Local Actions to Date.

Pursuant to the public health hazard determination provided by ODHS and ATSDR, the DEQ determined that the scope of necessary actions at NRE warranted expansion to include a human health risk evaluation to be overseen by the DEQ Cleanup Program. DEQ referred this Site to EPA for removal and assessment to ensure that a timely response is conducted to mitigate any imminent threat to human health and the environment posed by friable asbestos. DEQ has determined that the Site is a high priority for further action, and that a focused site assessment and possible interim measures must be completed promptly to mitigate any imminent threat to human safety. DEQ and ODHS have remained partners with EPA Region 10 and participate in weekly calls about the site, as well as having a presence on site during many removal activities.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The Site conditions pose a significant threat to public health and welfare which meet the criteria for response action under 40 C.F.R. § 300.415(b)(2) of the National Contingency Plan (NCP) as follows:

1. *Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants 40 C.F.R. § 300.415 (b) (2) (i).*

   Asbestos from insulation surrounding historic heating pipes as well as from from siding, shingles and other building materials are present on site. Asbestos has been confirmed on site by Federal and State officials. It is unknown how much total asbestos remains on site as some has been historically buried or removed.

2. *High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate 40 C.F.R. § 300.415 (b) (2) (iv).*

   Asbestos-containing materials are visible at the surface and below the surface throughout the Site. Sampling at the Site has confirmed asbestos fibers (amosite and crysotile) present in residential soils at levels of concern for some individuals and activities

3. *Weather conditions that may cause hazardous substances pollutants or contaminants to migrate or be released 40 C.F.R. § 300.415 (b) (2) (v).*

   The hotter temperatures, dry weather, and strong winds typical in the summer in the Klamath basin will continue to aid in the migration of asbestos containing soils. As soils dry out they are more likely to be transported by wind, causing the asbestos to become airborne and available for inhalation. In the spring time snow melt, rainfall, or other forms of run-off inducing events will tend to spread the contamination and uncover previously buried ACM. The summer months clearly present the highest risk as children are home all day, the soil is its driest, and winds their strongest.

4. *The availability of other appropriate federal or state response mechanisms to respond to the release 40 C.F.R. § 300.415 (b) (2) (vii).*

   No other local, state, or federal agency is in the position or has the

resources to independently implement an effective relocation action to address the on-going threats presented at the Site. EPA will conduct its actions in concert with state and local authorities.

5. *Other situations or factors that may pose threats to public health or welfare of the United States or the environment 40 C.F.R. § 300.415 (b) (2) (viii).*

Debris piles containing ACM remain on lots now occupied by residential homeowners with children. Asbestos fibers could be released from these piles through activities including homeowner landscaping and children playing. Asbestos fibers may also be released during removal activities near affected houses. Asbestos fibers may further be released during sampling activities conducted in support of the RI/FS or expanded site assessment. Temporary Relocation would facilitate a more strategic and systematic RI/FS and more effective targeted removal actions during the June-September construction season. Property access issues and general ease of movement throughout the site will be greatly simplified. Work days could begin earlier and end later without residents being present, hence more work could be completed in less time.

B. Threats to the Environment

The Site investigation has not proceeded far enough to know if the asbestos contamination is a threat to animals, water, and other parts of the environment. Asbestos is primarily a threat to human health.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

Asbestos is a generic term for a group of six naturally-occurring fibrous silicate minerals. Asbestos can cause asbestosis and is a recognized human carcinogen, causing lung cancer and mesothelioma, a lethal neoplasm of the lining of the chest and abdominal cavities. Cancer of the larynx and esophageal lining has also been associated with exposure to asbestos.

EPA is concerned about ongoing residential exposures to asbestos in soil at the North Ridge Estates site. Because the science associated with asbestos risk assessment is rapidly advancing, EPA has collected various types of data in a weight of evidence approach for understanding exposures and potential risks at the North Ridge Estates site. Briefly, indoor and outdoor air samples, dust samples, and soil samples have been

collected and analyzed using a variety of methods. The air samples collected from stationary monitors indicated relatively low levels of asbestos fibers in air. EPA also collected activity-based samples where workers wearing appropriate personal protective equipment and sampling pumps performed a variety of typical activities to determine whether fibers were released into the breathing zone upon soil disturbance. These data indicated that in fact asbestos fibers are released into the air during typical activities at the site. EPA also agitated soil samples within a glove box to determine qualitatively whether fibers in soil were released to air. Several of the glove box samples also indicated fibers were released upon soil disturbance. Finally, EPA and an MBK contractor both collected samples for evaluation using an elutriator – a device which mechanically tumbles soil in a chamber that air is passed through to determine the amount of fibers per unit mass of soil. The elutriator samples indicated that fibers were present both in the soil matrix and in samples of ACM. Subsequent emissions and exposure modeling of these elutriator results indicated that for some activities, fiber concentrations were increased and corresponding risks were elevated above acceptable levels.

There are uncertainties associated with each of these methods, but EPA is concerned about ongoing exposures to residents at the Site given the demonstrated (i.e., activity-based sampling) and modeled results. Because site conditions are dry, dusty and windy during the summer months and because children are not in school, there are potentials for more frequent contact with contaminated soil during summer months. Moreover, due to the significant resurfacing of ACM identified in the March 2005 survey, EPA anticipates the need for another surficial removal effort at the Site, which could be conducted more efficiently and expeditiously if residents were temporarily relocated. Temporary relocation would also facilitate more extensive removal efforts at the Site, such as soil excavation, which may be conducted this summer either as a coordinated removal action or remedial study in conjunction with the RI/FS.

In conclusion, consistent with EPA's guidance on temporary relocations (2002), Sec. IV.A ("Making the Relocation Decision), temporary relocation at North Ridge Estates is justified by the following factors:

- Health threats: completed pathways for uncontrolled exposure to contaminant, likely exacerbated during hot, dry summer months with children out of school;

- Safety of residents: field sampling and other removal activities may generate further releases of contaminants that raise personal safety concerns to residents;

- Efficiency of response action: temporary relocation minimizes concerns about noise, property access, and other restrictions on the hours or types of response activities that may be conducted at the Site.

A. Proposed Actions

1. Proposed Action Description

The following list outlines the proposed actions required to mitigate the threat to the public health and welfare or the environment posed by the asbestos present. In general, these areas have visible ACM debris strewn across the landscape and/or ACM debris only marginally covered with soil. A more detailed Scope of Work for this project is being developed with the assistance of a U.S. EPA Remedial Project Manager (RPM) for integrating removal and remedial actions.

The currently proposed temporary relocation action will involve the following:

a Assemble a formal relocation team, the team will include an On-Scene Coordinator (OSC), Remedial Project Manager (RPM), Community Involvement Coordinator (CIC), and representatives from the Office of Regional Counsel (ORC), Office of Environmental Assessment (OEA), the U.S. Army Corps of Engineers (USACE), Regional Media Relations and State/local government officials.

b Coordination, planning, and support for all residents who will be temporarily relocated.

c Coordination as necessary with Local and State officials, community leaders, local social service agencies, ATSDR, the media, and Headquarters Regional Coordinator.

d Notify residents verbally of voluntary relocation, document eligibility status, and determine unique family needs.

e Send formal notification letter to residents.

f Explain relocation assistance to residents.

g Obtain signed agreements from each household accepting temporary relocation and agreeing to comply with the expectations of the agreement.

h Affect the voluntary relocation of all involved residents.

i Keep communications open throughout the temporary relocation to answer residents questions and facilitate problem solving.

j Send written letters to residents announcing when they can return

to their homes. Work with residents to find a move date that is convenient to them in order to effect the temporary relocation within the period of June 10 - September 10.

k Notify landlords of termination of temporary relocation assistance.

l Make arrangements for residents' return.

2. Contribution to Remedial Performance
The temporary relocation contemplated in this removal action is not expected to be inconsistent with any potential remedial action, such as permanent relocation. Permanent relocation could be effected this summer as a result of private settlements, or could be selected through the RI/FS process before or after the end of temporary relocation. Temporary relocation may also, to the extent practicable, contribute to the efficient performance of remedial investigation activities and potentially remedial action by removing concerns about temporary releases of that could be caused by the field investigation activities and by extending the access to private properties and daily hours available for field activities.

3. Alternative Actions/Technologies.
None

4. Engineering Evaluation/Cost Analysis (EE/CA)

An EE/CA was not developed for this action. This is a time-critical removal and does not require an EE/CA.

5. Applicable or Relevant and Appropriate Requirements.

The National Contingency Plan, implementing CERCLA, requires that removal actions attain Applicable or Relevant and Appropriate Requirements (ARARs) under federal or state environment or facility siting laws, to the extent practicable. 40 CFR § 300.415(j). In determining whether compliance with ARARs is practicable, EPA may consider the scope of the removal action. 40 CFR § 300.415(j)(2). The scope of the temporary relocation proposed in this Action Memorandum is limited. For example, because impacts to surface waters have not been observed, ARARs for the Site do not include water quality standards under the Clean Water Act (CWA), 33 U.S.C. §§ 1251 *et seq.* , To the extent practicable, the proposed removal action will attain ARARs, including substantive elements of the federal Clean Air Act National Emission Standard for Asbestos, 40 C.F.R. § 61.14, and the Asbestos Requirements of Oregon Administrative Rules Chapter 340, Division 248.

<u>State ARARs</u>

On April 22, 2003, EPA requested DEQ to identify state ARARs for this Site. In referring this Site to EPA, DEQ has agreed to share all relevant information and provided notice of all state ARARs listed below. Because the scope of the temporary relocation does not include excavation of hazardous waste, ARARs for this action do not include the State of Oregon Hazardous Waste Management Rules and implementing regulations codified at OAR Chapter 340.

The following is a summary of state ARARs identified to date that may be applicable, or relevant and appropriate, to the proposed temporary relocation action:

Transportation of Hazardous Waste Materials, Chapter 340, Division 103, relating to the transportation of hazardous wastes to an off-site disposal facility.

Minimum Functional Standards for Solid Waste Handling, Chapter 340, Division 102 relating to the disposal of non-hazardous waste.

To Be Considered.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), 42 U.S.C. § 4601 et seq., and implementing regulations at 49 CFR Part 24, are not ARARs for this temporary relocation, in part because these regulations specifically address permanent relocations. Nevertheless, consistent with EPA's guidance on temporary relocation (April 2002), the URA and implementing regulations will be considered guidance for this temporary relocation action.

6. Project Schedule

Relocation planning activities can begin immediately after approval of the Action Memorandum. The temporary relocation action should take approximately five months to implement. This includes planning, physical relocation, and final return.

B. Estimated Costs

Assumptions

June 10 to September 10 is period for temporary relocation
27 households
54 adults
10 children ages 13-18
20 children ages 0-12
no needed furniture is contaminated, no furnishings require replacement

Cost of Temporary Housing

Apartments/ Rental Housing	27 families	$750 per month for 3 months	$ 60,750
June Hotels	27 families	$67 per night for 2 nights	$ 3,618
Sept Hotels	27 families	$60 per night for 2 nights	$ 3,240

Daily Allotment

HOH - full, other 13 & over-3/4, other 12 & under-1/2	
Move out perdiem 27 HOH, 37 other 13 & over, 20 other 12 & under	$ 3,399
Move in perdiem 27 HOH, 37 other 13 & over, 20 other 12 & under	$ 3,399
Incidentals only 81 days, 84 people, $2 per day	$ 13,608

Payment of Furniture Rental

n/a

Transportation of Personal Property

27 households	5000 lbs of personal goods per home, $0.25 per lb	$ 33,750
27 households	$25 move out allowance in June	$ 675
27 households	$25 move in allowance in Sept	$ 675

Utility Subsidy

Gas/Electric est. 1000 kwh per month at $0.09/kwh + $15/mo	$ 8,505
Water $ 42.39 per household per month	$ 3,434
Basic Phone $25 per household per month	$ 2,025

Utility Connection Costs

Gas/Electric $40 per household	$ 1,080
Water $40 per household	$ 1,080
Basic Phone $40 per household	$ 1,080

Personal Property

n/a

Site Security $ 35,000

Pet Boarding $ 20,000

Other Expenses

IAG with ACOE for assistance 450 hours at $100	$ 45,000

Contingency

25%	$ 60,080

REMOVAL PROJECT CEILING ***$ 300,398***

EPA direct and indirect costs, although cost recoverable, do not count toward the Total Removal Project Ceiling for this removal action.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If this action is delayed or not taken, the threat of exposure to humans and the environment will continue to exist and may increase due to migration of contaminants.

VII. OUTSIDE POLICY ISSUES

For any Fund-financed response action, such as the temporary relocation proposed in this Action Memorandum, the NCP directs EPA, to the extent practicable, to be sensitive to local community concerns in determining the need for, planning, and undertaking the response action. 40 CFR § 300.400(c)(4). Through public meetings, personal interviews, and other documented means, EPA has collected and considered the concerns of most or all members of the North Ridge Estates community. Many community members have expressed substantial concern about the risks associated with continuing exposure to asbestos contamination at the Site, and have expressed significant interest in temporary relocation to avoid further exposures, particularly during the hot, dry summer months when children will be out of school and at greater risk of exposure to site contaminants. The proposed temporary relocation is sensitive to these concerns, and if approved will be undertaken with continuing sensitivity to community concerns.

VIII. ENFORCEMENT

Identified PRPs have not been invited to carry out the proposed temporary relocation. EPA believes it would not be practicable to initiate and conclude negotiations with PRPs to carry out the temporary relocation properly and promptly in time to avoid greater exposures to children who would likely spend more on the Site during summer vacation from school. Pursuant to CERCLA Section 107, the U.S. Dept. of Justice has already filed a civil action to recover response costs incurred by EPA at this Site. Costs incurred by EPA under this Action Memorandum will be subject to cost recovery efforts in conjunction with the on-going litigation.

IX. RECOMMENDATION

This decision document represents the selected temporary relocation action for the North Ridge Estates Asbestos Site, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision to conduct a temporary relocation has been selected to alleviate the threats to human population posed by the asbestos contamination.

Conditions at the North Ridge Estates Site meet NCP Section 300.415(b) criteria for a temporary relocation and I recommend your approval of the proposed temporary relocation action. The project ceiling, if approved, will be $ 300,398. This amount comes from the North Ridge Estate Special Account, and if necessary the Regional Removal Allowance.

APPROVED

Daniel Opalski, Director
Office of Environmental Cleanup

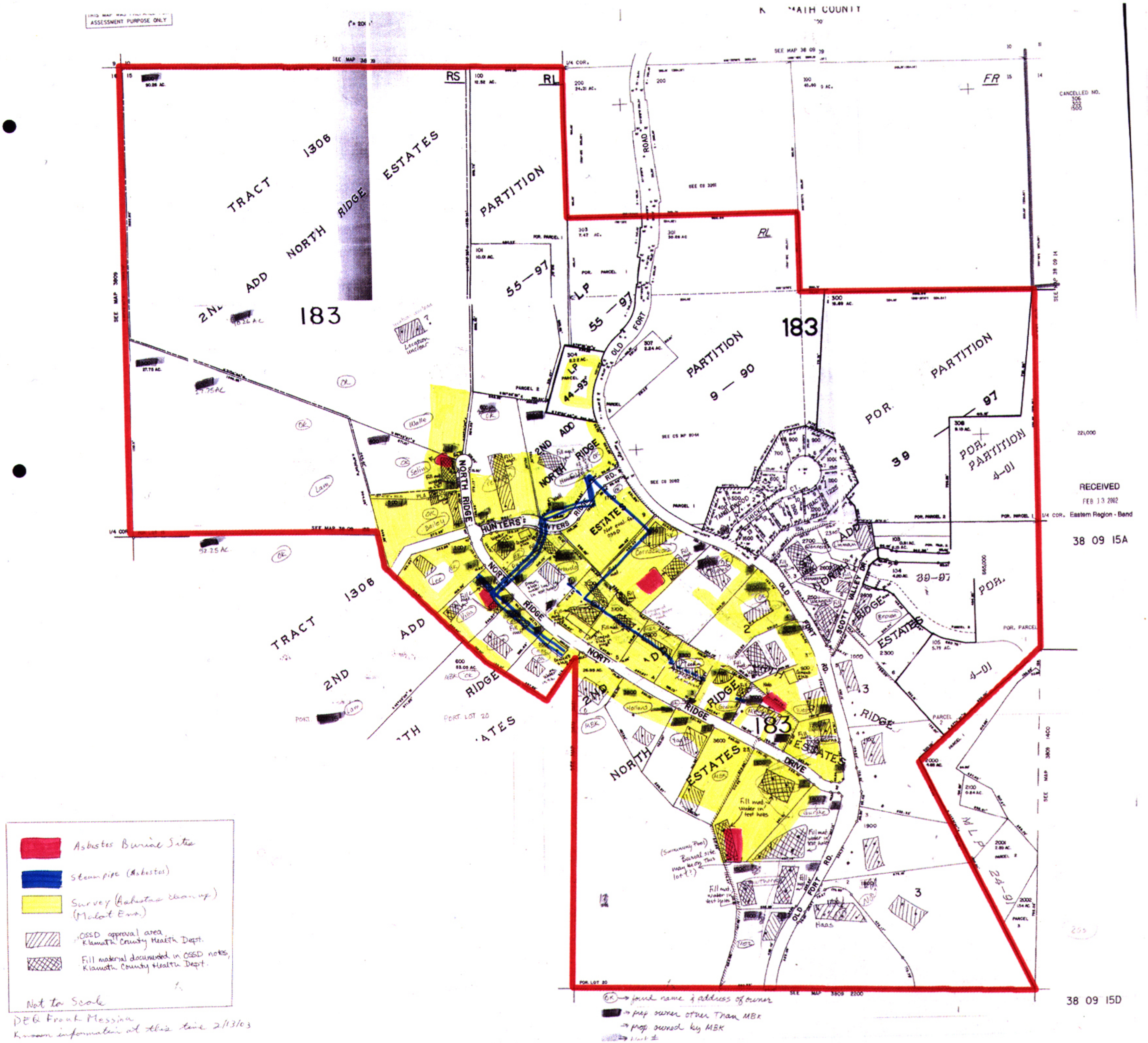
Date: 4/27/05

DISAPPROVED

Daniel Opalski, Director
Office of Environmental Cleanup

Date: _____

Attachment: Site Map


THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSE ONLY
KLAMATH COUNTY
TRACT 1306 2ND ADD NORTH RIDGE ESTATES
183
PARTITION 55—97
PARTITION 9—90
POR. PARTITION 39—97
POR. PARTITION 4—01
LP 44—93
OLD FORT ROAD
NORTH RIDGE
HUNTERS RIDGE RD.
NORTH RIDGE DRIVE
SCOTT VALLEY DR.
TANGLEWOOD
THICKET CT.
MLP 24—91
CANCELLED NO. 306 302 1500
RECEIVED FEB 13 2002 Eastern Region - Band
38 09 15A
38 09 15D
Location unclear
Not eval. for OSSD
(Swimming Pool) Burial site may be on this lot (?)
Fill mat. water in test holes
Asbestos Burial Sites
Steam pipe (Asbestos)
Survey (Asbestos clean up) (Malot Env.)
OSSD approval area Klamath County Health Dept.
Fill material documented in OSSD notes, Klamath County Health Dept.
Not to Scale
DEQ Frank Messina
Known information at this time 2/13/03
OK → found name & address of owner
→ prop owner other than MBK
→ prop owned by MBK